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November 4, 2014

VIA ECF

Hon. Laura Taylor Swain  
United States District Judge  
Southern District of New York  
500 Pearl Street  
NY NY 10007-1312

**Re: United States v. Bonventre, et. al., 10-cr-228 (LTS)**

Dear Judge Swain:

We write with regard to the government's new letter brief with respect to sentencing, filed yesterday. During our appearance before the Court last week, Your Honor requested some follow up information from the government. The government has taken the opportunity to submit a new, nine page letter brief containing far more than reasonably tailored responses to the Court's discrete questions.

Instead, the government has submitted another memorandum of law—this on top of the extensive briefing it has already submitted and the 90 minutes of argument it availed itself of last week. Almost unbelievably, it also seems to have submitted yet another proposed forfeiture order for Ms. Crupi – the sixth by our count.

We write to lodge our objection to the government's submission. By our reckoning, this is not what the Court asked for and no permission was sought for something more than what was requested from the bench. Furthermore, we believe that certain of the government's statements and interpretations in the brief are overly aggressive and are not even really responsive to the questions posed by the Court.

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For these reasons, we request that the Court disregard this filing. If the Court is inclined to credit the government's late submission, we respectfully request a short response. We would require no more than three pages.

Respectfully Submitted,

/s/  
Eric R. Breslin

cc: All counsel (*via ECF*)